

EXHIBIT

1

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
AT NASHVILLE**

JOHN DOE #11,

Plaintiff,

v.

**WILLIAM B. LEE, in his official
capacity as Governor of the State of
Tennessee, and**

**DAVID B. RAUSCH, in his official
capacity as Director of the Tennessee
Bureau of Investigation,**

Defendants.

Case Nos. 3:22-cv-00338

Judge Richardson

DECLARATION OF SHELLY SMITHERMAN

I, Shelly Smitherman, state as follows:

1. My name is Shelly Smitherman, and I am over the age of eighteen (18), of sound mind, and competent to make the statements contained in this declaration.
2. I am an Assistant Special Agent in Charge of the Criminal Intelligence Unit in the Tennessee Bureau of Investigation ("TBI").
3. As part of my duties, I oversee the administration of the Tennessee sex offender registry.
4. I have been employed with the TBI for the past 20 years.
5. For the past 6 years, I have been responsible for overseeing the administration of the Tennessee sex offender registry.

6. Working with an outside vendor, TBI was able to determine how many offenders who are subject to the Tennessee Sexual Offender and Violent Sexual Offender Registration, Verification, and Tracking Act of 2004, Tenn. Code Ann. §§ 40-39-201 – 218 ("the Act") live in each of Tennessee's 95 counties.

7. As of Tuesday, April 5, 2022, here are the results of that determination:

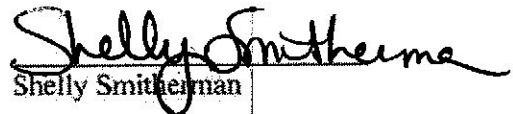
- a. No County Listed: 17
- b. Anderson: 125
- c. Bedford: 129
- d. Benton: 61
- e. Bledsoe: 38
- f. Blount: 179
- g. Bradley: 259
- h. Campbell: 92
- i. Cannon: 46
- j. Carroll: 93
- k. Carter: 89
- l. Cheatham: 94
- m. Chester: 40
- n. Claiborne: 61
- o. Clay: 25
- p. Cocke: 126
- q. Coffee: 174
- r. Crockett: 69
- s. Cumberland: 135
- t. Davidson: 1,418
- u. Decatur: 31
- v. Dekalb: 44
- w. Dickson: 130
- x. Dyer: 105

y.	Fayette: 71
z.	Fentress: 65
aa.	Franklin: 94
bb.	Gibson: 162
cc.	Giles: 85
dd.	Grainger: 52
ee.	Greene: 134
ff.	Grundy: 31
gg.	Hamblen: 120
hh.	Hamilton: 551
ii.	Hancock: 21
jj.	Hardeman: 79
kk.	Hardin: 76
ll.	Hawkins: 101
mm.	Haywood: 54
nn.	Henderson: 91
oo.	Henry: 128
pp.	Hickman: 96
qq.	Houston: 27
rr.	Humphreys: 78
ss.	Jackson: 26
tt.	Jefferson: 131
uu.	Johnson: 38
vv.	Knox: 623
ww.	Lake: 19
xx.	Lauderdale: 89
yy.	Lawrence: 133
zz.	Lewis: 45
aaa.	Lincoln: 74
bbb.	Loudon: 83
ccc.	Macon: 77

ddd.	Madison: 398
eee.	Marion: 89
fff.	Marshall: 73
ggg.	Maury: 208
hhh.	McMinn: 142
iii.	McNairy: 88
jjj.	Meigs: 44
kkk.	Monroe: 128
lll.	Montgomery: 318
mmm.	Moore: 16
nnn.	Morgan: 35
ooo.	Obion: 99
ppp.	Overton: 45
qqq.	Perry: 26
rrr.	Pickett: 7
sss.	Polk: 42
ttt.	Putnam: 139
uuu.	Rhea: 145
vvv.	Roane: 120
www.	Robertson: 176
xxx.	Rutherford: 373
yyy.	Scott: 78
zzz.	Sequatchie: 45
aaaa.	Sevier: 208
bbbb.	Shelby: 2,445
cccc.	Smith: 43
dddd.	Stewart: 36
eeee.	Sullivan: 285
ffff.	Sumner: 250
gggg.	Tipton: 92
hhhh.	Trousdale: 28

iiii. Unicoi: 40
jjjj. Union: 55
kkkk. Van Buren: 26
llll. Warren: 110
mmmm. Washington: 226
nnnn. Wayne: 32
oooo. Weakley: 82
pppp. White: 80
qqqq. Williamson: 72
rrrr. Wilson: 142

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.


Shelly Smitherman

5/12/2022

May 12, 2022